

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: PETER N. DECONZO and	:	CHAPTER 13
DONNA DECONZO	:	
Debtor(s)	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
PETER N. DECONZO and	:	
DONNA DECONZO	:	
Respondent(s)	:	CASE NO. 5-19-bk-01904

TRUSTEE'S OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

AND NOW, this 22nd day of June, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court – regarding Wells Fargo.
  - b. Plan ambiguous – See, Section 9.3 re: student loan.
  - c. Lump sum payment in May, 2024.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 22nd day of June, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Ronald Santora, Esquire  
1188 Wyoming Avenue  
Forty Fort, PA 18704

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee